

AUSA Assigned: CAB

County of Investigation: Spokane

In Re: Criminal Complaint for Vincint Petrushkin

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Nov 09, 2021

SEAN F. McAVOY, CLERK

AFFIDAVIT

STATE OF WASHINGTON)
) ss
Spokane County)

AFFIDAVIT IN SUPPORT

I, Taylor Clarke, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation and have been since March 2016, at which time I attended the basic field training course for Special Agents in Quantico, Virginia. I have served in assignments in the Los Angeles, San Antonio, and Seattle Divisions. I have been assigned to investigate violations of federal law including export violations, public corruption, violent crimes and drug trafficking. Since January 2021, I have been assigned to the Spokane Resident Agency Safe Streets Task Force. I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. The facts set forth below are based upon (1) my own personal observations; (2) reports and information provided to me by other law enforcement agents or government agencies; (3) evidence collected through investigative operations. Because this affidavit is being submitted solely for establishing probable cause to support a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have only set forth facts necessary to support the authorization of the requested arrest warrant and criminal complaint.

3. I am aware from my training and experience that 18 U.S.C. § 922(g)(1) prohibits those who have been convicted of a crime with the potential for a term of incarceration of over one year are prohibited from possessing firearms or ammunition that have travelled in or affected interstate or foreign commerce.

FACTS IN SUPPORT OF COMPLAINT

4. On November 5, 2021, the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) planned an undercover operation involving Randy HOLMES (aka “Whispers”). The operation was set to occur at the Motel 6 located at 1508 S Rustle Street, Spokane, WA. The undercover agent communicated with HOLMES and arranged to meet HOLMES to conduct the transaction.

5. At approximately 4:39pm, Spokane Police Department (“SPD”) officers responded to the Motel 6 after receiving reports of shots fired in the area.

Officers arriving on scene treated HOLMES for multiple gunshot wounds after which he was transported to the hospital. A Glock Model 17 firearm, serial number BHBR218, was located on scene, collected, and submitted to Spokane County property by responding officers.

6. That same day, I responded to the Motel 6 and reviewed video surveillance footage capturing the parking lot at the Motel 6. The video depicted an individual, who I know to be an undercover agent with the ATF, exchanging gunfire with HOLMES within the area of a grey Dodge Charger license plate BBS1566, registered to HOLMES per Washington State Department of Licensing records.

7. The grey Dodge Charger was observed leaving the Motel 6 parking lot at a high rate of speed. That same day the grey Dodge Charger was located about 5:30pm at the Hampton Inn, located to the west of the Motel 6. I spoke to TFO Matt Rose who reviewed surveillance video capturing the Hampton Inn. At approximately 5:02pm (same day), the video depicted two individuals, matching the description of Vincint PETRUSHKIN (aka "Vegas") ("PETRUSHKIN") and William BURNS (aka "Serio") ("BURNS"), arriving at the Hampton Inn in a grey Dodge Charger. PETRUSHKIN and BURNS exited the vehicle and walked around the parking lot until they separated. BURNS departed on foot to the west and travelled out of view of the cameras. PETRUSHKIN circled back to the grey

Dodge Charger and removed a green backpack and large duffel bag from the vehicle. PETRUSHKIN departed the Hampton Inn on foot to the north.

8. SPD Officer Lequire contacted BURNS at approximately 5:30pm at Sunset Blvd and Government Way in Spokane as he matched the description of the “look out” on the individuals suspected of fleeing the shooting scene. BURNS was on foot. After *Miranda* warnings, BURNS, who was sweating and appeared nervous, stated to Officer Leguire that he met HOLMES at the 7-11 in town and asked for a ride. Another individual was in the vehicle who BURNS did not know. Officer Leguire had a surveillance photo from the Hampton Inn depicting PETRUSHKIN (no identifiers) and showed the photo to BURNS. BURNS advised the individual in the photo was the person in the vehicle with HOLMES and him. BURNS advised the person in the vehicle with HOLMES appeared to have very white skin in the photograph, when he actually was dark skinned or “black.” BURNS advised HOLMES made a stop at the Motel 6. While in the parking lot of the Motel 6, HOLMES exited the grey Dodge Charger to meet with an individual. When gunfire was exchanged BURNS jumped into the driver’s seat of the grey Dodge Charger and fled with the other individual (PETRUSHKIN). BURNS did not want to give his cell phone number or address. BURNS stated he had no knowledge of what was going to happen at the Motel 6.

9. On November 9, 2021 I interviewed PETRUSHKIN with SPD

Detective Craig Wendt. During an audio / video recorded post-*Miranda* statement, PETRUSHKIN admitted to being at the Motel 6 during the time of the shooting to purchase a firearm with “Whispers” and an unknown male. PETRUSHKIN stated it was going to be the three of them present for the deal until “Whispers” changed it to just himself going to conduct the transaction. The unknown male passed a gun (described by PETRUSHKIN as a Glock) to PETRUSHKIN who held it, looked at it, and then passed it to “Whispers” for “Whispers” to use as protection for the deal. “Whispers” then exited the grey Dodge Charger. PETRUSHKIN stated that when shots were fired, he and the unknown male fled the scene in the vehicle.

10. PETRUSHKIN has a prior conviction subject to a potential punishment of a term of incarceration exceeding one year, namely Assault -2. He was sentenced to 17 months of incarceration. PETRUSHKIN is currently under Washington State Department of Corrections supervision stemming from that conviction.

11. I am aware that a Glock firearm is not manufactured in the State of Washington. Therefore, its location in the State of Washington means it impacted / affected interstate and/or foreign commerce.

CONCLUSION

12. Based upon the above facts, I believe probable cause exists to charge VINCINT PETRUSHKIN with 18 U.S.C. § 922(g)(1).

I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

Respectfully Submitted,



Special Agent Taylor Clarke
Federal Bureau of Investigation

Subscribed electronically and sworn to telephonically this 9th day of November,
2021.



Honorable James Goeke
United States Magistrate Judge